

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 9**

NOLAN ENTERPRISES, INC. D/B/A
CENTERFOLD CLUB

and

Case 09-CA-220677

BRANDI CAMPBELL, AN INDIVIDUAL

Respondent Nolan Enterprises' Motion to Continue Hearing

Now comes Respondent, Nolan Enterprises d/b/a Centerfold Club, and requests a continuance of at least 45 days of the hearing *currently set in this matter on December 17, 2018*.

Respondent is aware of the serious nature of the Complaint filed against it by the Board. Its corporate representatives previously responded to the Board's initial inquiry and responded to the Complaint. With the formal hearing approaching, however, Respondent realized that it needed the assistance of counsel to appropriately defend the charges against it. Undersigned counsel was retained yesterday, December 11, 2018, to represent the Respondent. Because the hearing is set to take place in two business days, counsel for Respondent is requesting that the hearing be continued to allow her to become familiar with the case and prepare for the hearing. Respondent would normally request a 30-day continuance but, because counsel is going to be traveling out of the state for several weeks in connection with the upcoming holidays, Respondent is requesting a continuance of the hearing for at least 45 days to allow counsel to properly prepare. Counsel has

attempted to reach Charging Party, Brandi Campbell, to inquire regarding her position on the continuance, but has not been successful in reaching her as of the time of this filing.

Respectfully submitted,

/s/ Christina L. Corl

Christina L. Corl (0067869)

PLUNKETT COONEY

300 East Broad Street, Suite 590

Columbus, Ohio 43215

Tel: (614) 629-3018

Fax: (614) 629-3019

Email: ccorl@plunkettcooney.com

Counsel for Nolan Enterprises

CERTIFICATE OF SERVICE

Please take notice that counsel hereby certifies the foregoing Motion to Continue Hearing was transmitted to all parties on this **12th day of December, 2018**.

/s/ Christina L. Corl

Christina L. Corl (0067869)

PLUNKETT COONEY

Open.P0235.P0235.21360972-1